

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, State Bar Number 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Blvd, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendants
19 FIDELITY NATIONAL TITLE GROUP, INC., FIDELITY
20 NATIONAL TITLE INSURANCE COMPANY, and
21 LAWYERS TITLE OF NEVADA, INC.

22 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
23 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

24 Gary L. Compton, State Bar No. 1652
25 2950 E. Flamingo Road, Suite L
26 Las Vegas, Nevada 89121

27 **UNITED STATES DISTRICT COURT**

28 **DISTRICT OF NEVADA**

WELLS FARGO BANK, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:21-CV-00112-RFB-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF No. 1)**

SECOND REQUEST

COMES NOW defendants Fidelity National Title Group, Inc. ("FNTG"), Fidelity National Title Insurance Company ("Fidelity") and Lawyers Title of Nevada, Inc. ("Lawyers Title") (collectively "Defendants") and plaintiff Wells Fargo Bank, National Association ("Wells Fargo"), by and through their respective attorneys of record, which hereby agree and stipulate as

1 follows:

2 1. On January 19, 2021 Wells Fargo filed its complaint in the Eighth Judicial District
3 Court for the State of Nevada;

4 2. On January 20, 2021, Fidelity removed the instant case to the United States District
5 Court for the State of Nevada (ECF No. 1);

6 3. On February 24, 2021, the Court granted the parties first stipulation to extend the
7 time for Defendants to respond to the complaint until March 29, 2012 (ECF No. 12);

8 4. Defendants request a further 30-day extension, through and including Wednesday,
9 April 28, 2021, for Defendants to file their respective responses to Wells Fargo's complaint to
10 afford Defendants' counsel additional time to review and respond to Wells Fargo's complaint.

11 5. Counsel for Wells Fargo does not oppose the requested extension;

12 6. This is the second request for an extension made by counsel for Defendants, which
13 is made in good faith and not for the purposes of delay.

14 7. This stipulation is entered into without waiving any of Defendants' objections
15 under Fed. R. Civ. P. 12.

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 **IT IS SO STIPULATED** that Defendants' deadline to respond to the complaint is hereby
2 extended through and including Wednesday, April 28, 2021.

3 Dated: March 25, 2021

SINCLAIR BRAUN LLP

4
5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR

Attorneys for Defendants

7 FIDELITY NATIONAL TITLE GROUP,

INC., FIDELITY NATIONAL TITLE

8 INSURANCE COMPANY, and LAWYERS

TITLE OF NEVADA, INC.

9 Dated: March 25, 2021

WRIGHT FINLAY & ZAK, LLP

10
11 By: /s/-Lindsay D. Robbins

12 LINDSAY D. ROBBINS

Attorneys for Plaintiff

13 WELLS FARGO BANK, NATIONAL

ASSOCIATION

14 **IT IS SO ORDERED.**

15 DATED this 26th day of March, 2021.

16
17 

18 DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE